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*Attorneys for Intervenors IBEW Locals 387 and 769*

**BEFORE THE ARIZONA CORPORATION COMMISSION**

TOM FORESE, Chairman  
DOUG LITTLE, Commissioner  
BOYD DUNN, Commissioner  
ANDY TOBIN, Commissioner  
BOB BURNS, Commissioner

IN THE MATTER OF THE APPLICATION  
OF ARIZONA PUBLIC SERVICE  
COMPANY FOR A HEARING TO  
DETERMINE THE FAIR VALUE OF THE  
UTILITY PROPERTY OF THE COMPANY  
FOR RATEMAKING PURPOSES, TO FIX A  
JUST AND REASONABLE RATE OF  
RETURN THEREON, TO APPROVE RATE  
SCHEDULES DESIGNED TO DEVELOP  
SUCH RETURN.

Docket No.: E-01345A-16-0036

Docket No.: E-01345A-16-0123

**REPLY BRIEF OF INTERVENORS IBEW  
LOCALS 387 AND 769**

IN THE MATTER OF FUEL AND  
PURCHASED POWER PROCUREMENT  
AUDITS FOR ARIZONA PUBLIC SERVICE  
COMPANY

Intervenors Local Unions 387 and 769, International Brotherhood of Electrical Workers, AFL-CIO, CLC ("IBEW Locals"), by and through undersigned counsel, hereby submit this Reply Brief in support of the Settlement Agreement filed by Commission Staff on March 27, 2017 in the above-captioned Docket.

1 The IBEW Locals have reviewed the initial post-hearing briefs filed by the parties in this  
2 matter on May 17, 2017 and submit that their initial brief sufficiently addresses the arguments  
3 raised by the parties to this proceeding. Therefore, the IBEW Locals offer a brief response to the  
4 argument made by Intervenor Electrical District Number Six, Pinal County, Arizona ("ED6");  
5 Electrical District Number Seven of the County of Maricopa, State of Arizona ("ED7"); Aguila  
6 Irrigation District ("AID"); Tonopah Irrigation District ("TID"); Harquahala Valley Power  
7 District ("HVPD"); and Maricopa County Municipal Water Conservation District Number One  
8 ("MWD") (hereinafter collectively referred to as the "Districts") that the settlement agreement is  
9 somehow unequal and not in the public interest due to the settlement process. In their initial  
10 post-hearing brief, the Districts state that "[t]his non-unanimous settlement process, which left  
11 out parties with less bargaining power, resulted in an unequal settlement that is not in the public  
12 interest."<sup>1</sup> According to the Districts, "the settlement process should have included steps to  
13 address APS's outsized power and recognize the inherent structural inequality among the  
14 parties."<sup>2</sup> What the Districts seem to be taking issue with is the whole concept of parties  
15 reaching non-unanimous settlement agreements – a process that has successfully existed for  
16 decades and that produces many benefits.<sup>3</sup>

17 To begin, all intervenors were invited to participate in the settlement discussions in this  
18 case. The parties were always notified of settlement meetings, term sheets and handouts were  
19 distributed in advance, and each party had the opportunity to be present and heard on their issues.  
20 These discussions included over 30 parties who participated in varying degrees in the settlement  
21 meetings. The Settlement Agreement incorporates various provisions that were either direct  
22 suggestions made during the discussions or that were prompted by the expressed positions of  
23 signatories and non-signatories. Notably, there is not one party that got everything it wanted in  
24 the Settlement Agreement. This is because settlement by its nature involves a give and take  
process – concessions were made on behalf of each signatory. What is remarkable is that only 5  
of the 40 intervening parties filed testimony in opposition to the Settlement Agreement, and 29

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<sup>1</sup> The Districts' Closing Brief in Opposition to Non-Unanimous Settlement Agreement at 5.

<sup>2</sup> *Id.*

<sup>3</sup> See, Stefan H. Krieger, *Problems for Captive Ratepayers in Nonunanimous Settlements of Public Utility Rate Cases*, YALE J. ON REG., Vol. 12:279 (1995) (stating that the energy crisis of the 1970's contributed to the rapid increase in rate cases which caused the development of new methods for rate case resolution – "including the use of nonunanimous settlements.").

1 parties chose to become signatories to it. This breadth of participation should be accorded great  
2 weight in demonstrating that the Settlement Agreement is just, reasonable, and in the public  
3 interest. Furthermore, dissenting parties were protected through the customary rights of notice  
4 and an opportunity to be heard. Contested issues remain just that, contested. The Commission  
5 will make its determination based on the record developed. What remains entirely unclear is  
6 how this process has "left out parties" in any way as the Districts assert.

7 Non-unanimous settlement agreements have been reached in public utility rate cases for  
8 decades. This is because settling rate cases has many advantages over time-consuming litigation,  
9 and requiring a unanimous agreement is not only unrealistic, it encourages "hostage-taking."<sup>4</sup> In  
10 addition, the District's assumption that the settlement negotiations must be among equals is  
11 simply fallacious. A balance of power in negotiations does not reflect real life and is not a  
12 prerequisite to settlement. That being said, there was no attempt by the alleged stronger parties  
13 to intimidate any alleged weaker party into settlement in this case. To the contrary, the alleged  
14 stronger parties went to great lengths to provide data and explain the process to the alleged  
15 weaker parties. While it is true that all of the non-signatories' issues were not resolved in the  
16 Settlement Agreement, they were not ignored. Whatever issues that may have been excluded  
17 were done so after serious bargaining among capable, knowledgeable parties. As a result, the  
18 Settlement Agreement provides an effectively crafted and innovative result that is just,  
19 reasonable, and in the best interest of the public.

20 In sum, the IBEW Locals respectfully request that the Commission approve the  
21 Settlement Agreement in its present form.

22 RESPECTFULLY SUBMITTED this 1<sup>st</sup> day of June, 2017.

23 

24 Emily A. Tornabene, Esq.

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<sup>4</sup> See, Alan P. Buchmann and Robert S. Tongren, *Nonunanimous Settlements of Public Utility Rate Cases: A Response*, YALE J. ON REG., Vol.13:343 (1996).

1 **CERTIFICATE OF SERVICE**

2 Original and thirteen copies of the IBEW Locals' Reply Brief filed this 1<sup>st</sup> day of June, 2017,  
3 with:

4 Arizona Corporation Commission  
5 Docket Control Center  
6 1200 West Washington Street  
7 Phoenix, Arizona 85007-2996

8 Copies of the foregoing transmitted electronically or mailed this same date to those identified on  
9 the attached service list for this docket.

10 /s/ Stacey L. Lucas

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